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George V. Voinovich
Governor

February 9, 1998

Mr. Michael DeRosa
ENTACT, Inc.
1360 North Wood Dale Road
Suite A
Wood Dale, IL 60191

RE: Master Metals Site - Engineering Evaluation and Cost Analysis (EE/CA) Data Report

Dear Mr. DeRosa:

The Engineering Evaluation and Cost Analysis (EE/CA) Data Report for the Master Metals site in Cleveland, Ohio was received by this office on January 20, 1998. As requested by U.S. EPA Remedial Project Manager in the interests of time exigencies, Ohio EPA's comments on the report are being sent directly to you.

Briefly, Ohio EPA concurs with the comments by U.S. EPA on the report. Additional (detailed) comments, as a function of the sections of the report, are provided below.

Section 2.1 Site Description *Comment* # 1 (page 2): Although the Master Metals site is located in a heavily industrialized area, the fact that the nearest residential area begins approximately 2,000 feet to the northwest, and that a playground and athletic field are located approximately 1,500 feet to the east should be mentioned to enable the site to be placed in perspective.

Section 2.2.1 On-Site Sampling *Comment* # 2 (page 2): Ohio EPA would recommend that, with reference to the historical sampling (conducted by Compliance Technologies, Inc. and Ecology and Environment), lead and other inorganic levels are reported in terms of concentration in the soil (mg/kg), rather than as order of magnitude comparisons, so as to provide an understanding in this section of the actual levels recorded at the site.

Section 2.2.1 On-Site Sampling *Comment* # 3 (page 3 and Table 2-1): The Agency agrees with U.S. EPA's comments that the XRF is primarily a screening technique to assist in directing extent of contamination and excavation activities. The (XRF) levels provided in Table 2-1, although providing useful information, should not therefore be assumed to be definitive in terms of characterizing the rate and extent of perimeter contamination. These comments are also applicable to Table 3-1. For additional comments on the comparison of XRF data to laboratory data, please see the last comment.

Section 3.2 On-Site Sample Results *Comment* # 4 (page 5 and Table 3-3): Although the data presented in Table 3-3 indicate that lead is the primary contaminant of concern in the soil, please note that arsenic is present at certain on-site locations at levels above those that would normally be assumed to pose a threat to human health (calculated using standard risk assessment methodology).